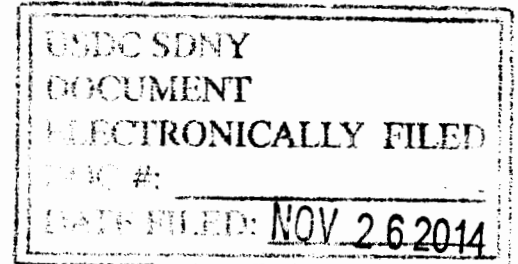


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Via ECF
Via Messenger



November 25, 2014

The Hon. Laura Taylor Swain
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007

RECEIVED

Re: *Universitas Education, LLC v. Nova Group, Inc.*, No. 11-cv-1590-LTS-HBP (S.D.N.Y.)

Dear Judge Swain:

We represent Petitioner/Judgment Creditor Universitas Education, LLC ("Universitas") in the above-captioned action, and write to respectfully request a modification to the Order to Show Cause ("OSC") that the Court entered on November 14 (Dkt. No. 498).

The OSC orders that Universitas serve its opposition to the Grist Mill Trust's ("GM Trust's") motion for a protective order by November 26, and that the GM Trust serve its reply by December 3. We respectfully request a brief adjournment of the briefing schedule, setting the opposition deadline for December 4, and the reply deadline for December 11. **Counsel for the GM Trust has consented to the proposed adjournment.**

On November 20, nearly a week following entry of the OSC, interested parties Minneapolis Trailer Sales, Inc., Keith Kornovich, and Mark Kornovich (the "MTS Parties") moved for a protective order and sanctions against Universitas in connection with the same events underlying the GM Trust's motion (Dkt. No. 502). The MTS Parties seek relief that is identical to that which the GM Trust seeks as part of its own motion—namely, relief from the Restraining Notice served by Universitas on Lincoln Financial Group so as to permit the transfer of insurance policies insuring the lives of Keith and Mark Kornovich. See Dkt. Nos. 498 & 502. Pursuant to Local Civil Rule 6.1(b), Universitas's opposition to the MTS Parties' motion must be served by December 4, and the MTS Parties' reply must be served by December 11.

Given the substantial overlap in the issues presented by these motions, Universitas requests this adjournment so that it may oppose both motions in a single Opposition memorandum. This adjournment would bring the two briefing schedules in line, reduce the volume of papers that the Court would need to review, and facilitate an efficient resolution of the issues in dispute.



The Hon. Laura Taylor Swain
November 24, 2014
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There have been no previous requests or motions seeking adjournments with respect to this OSC. We are available for a telephonic conference should the Court need additional information.

Respectfully submitted,

A handwritten signature in cursive script that reads "Paula Colbath" followed by a circled "TD".

Paula K. Colbath
Loeb & Loeb LLP

cc: Dan E. LaBelle (attorney for Grist Mill Trust Welfare Benefit Plan) (via ECF)
All Other Counsel of Record (via ECF)

The requested extension is granted.

SO ORDERED:

A handwritten signature in cursive script, likely of the judge, written over a horizontal line.

11/25/14
HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE